

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE
2005 JAN 28 P 4:02

CHAMPPS ENTERTAINMENT, INC.,
Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP,
INC., and NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH,
PA,
Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.
1:04-cv-11444-RWZ

**ASSENTED-TO MOTION OF THE DEFENDANTS, AMERICAN INTERNATIONAL GROUP,
INC. AND NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., TO
ENLARGE TIME TO RESPOND TO THE COMPLAINT OF THE PLAINTIFF,
CHAMPPS ENTERTAINMENT, INC.**

The defendants, American International Group, Inc. ("AIG") and National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), respectfully move, **with the assent of the plaintiff**, to enlarge the time by which AIG and National Union must answer, object or otherwise respond to the plaintiff's Complaint until February 11, 2005.

On December 13, 2004, the United States District Court for the Southern District of New York (the "New York Federal Court") granted National Union's Petition to Compel Arbitration which was filed on August 9, 2004. In light of the New York Federal Court's ruling, the parties have been exploring the possibility of settlement. Accordingly, the parties seek an enlargement of time until February 11, 2005 to permit for continued settlement discussions between the parties.

Counsel for the plaintiff assented to this motion by telephone on January 27, 2005.

WHEREFORE, AIG and National Union request that this Court allow this Assented-To Motion and extend the time for AIG and National Union to respond to Champp's Complaint until February 11, 2005.

The Defendants,

The Plaintiff,

AMERICAN INTERNATIONAL GROUP, INC. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,

CHAMPPS ENTERTAINMENT, INC.,

By their Attorneys,

By its Attorneys,



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CERTIFICATE OF Rule 7.1 CONFERENCE AND OF SERVICE

I, Eric M. Chodkowski, hereby certify that, prior to filing the within motion, I conferred with counsel for the plaintiff concerning said motion, who advised that they assent to said motion. I further certify that on January 28, 2005, I served a copy of the above motion by mailing same, postage prepaid to all counsel of record.



Eric M. Chodkowski